

**IN THE UNITED STATES DISTRICT COURT - NORTHERN DISTRICT
OF WEST VIRGINIA**

**SAMANTHA BROOKOVER and
AMANDA ABRAMOVICH,**

Plaintiffs,

v.

**CIVIL ACTION NO.: 1:17-cv-57
HONORABLE IRENE M. KEELEY**

**GILMER COUNTY, DEBBIE ALLEN, both
individually and in her official capacity
as Gilmer County Deputy Clerk and
JEAN BUTCHER, both individually and
in her official capacity as Gilmer
County Clerk,**

Defendants.

**JOINT MOTION TO EXTEND DEADLINES IN FIRST ORDER AND NOTICE
REGARDING DISCOVERY AND SCHEDULING**

COME NOW Plaintiffs, Samantha Brookover and Amanda Abramovich, by counsel, Robert M. Bastress, Jr.; Richard B. Katskee, Eric Rothschild, Kelly M. Percival, and Americans United for Separation of Church and State; Brian D. Netter and Manuel J. Velez and the law firm of Mayer Brown, LLP; and Defendants, Gilmer County, Debbie Allen and Jean Butcher, by counsel, Wendy E. Greve, and the law firm of Pullin, Fowler, Flanagan, Brown & Poe, PLLC, and request that the Court enter an Order extending the following deadlines in the Court's First Order and Notice Regarding Discovery and Scheduling by thirty (30) days:

The First Order and Notice Regarding Discovery and Scheduling was entered on May 8, 2017 setting the Rule 26 Report filing date for July 10, 2017, Scheduling Conference for July 24, 2017 and Initial Discovery Disclosures for July 31, 2017.

The Parties have been in ongoing settlement negotiations. Both parties state that good cause exists to amend the current First Order and Notice Regarding Discovery and Scheduling.

WHEREFORE, for the foregoing reasons, Plaintiffs, Samantha Brookover and Amanda Abramovich, and Defendants, Gilmer County, Debbie Allen and Jean Butcher, respectfully request that this Court grant their Joint Motion to Extend the Deadlines in the First Order and Notice Regarding Discovery and Scheduling by thirty (30) days, so that the new deadlines are as follows:

Rule 26 Report – August 9, 2017

Scheduling Conference – August 23, 2017

Initial Discovery Disclosures – August 30, 2017

AGREED TO BY:

/s/ Wendy E. Greve
Wendy E. Greve, Esquire
Pullin, Fowler, Flanagan, Brown & Poe, PLLC
JamesMark Building
901 Quarrier Street
Charleston, WV 25301
Counsel for Defendants

/s/ Robert M. Bastress, Jr.
Robert M. Bastress, Jr., Esquire
WVU College of Law
PO Box 1295
Morgantown, WV 26505
Counsel for Plaintiffs

Richard B. Katskee, Esquire
Eric Rothschild
Kelly M. Percival
Americans United for Separation of Church and State
1310 L. Street NW, Suite 200
Washington, DC 20005
Counsel for Plaintiffs

Brian D. Netter, Esquire
Mayer Brown, LLP
1999 K Street, NW
Washington, DC 20006
Counsel for Plaintiffs

Manuel J. Velez, Esquire
Mayer Brown, LLP
1221 Avenue of the Americas
New York, NY 10020
Counsel for Plaintiffs